

REMARKS

Claims 41, 54-62 and 64 have been amended. No new matter has been added. The Applicant respectfully requests reconsideration of the Examiner's §102 and §103 rejections of the pending claims in light of the foregoing amendments and the following remarks.

Claim Rejections Under 35 U.S.C. §102(e)

Claims 41, 44, 46, 47, 50, 53-55, 57, 61, and 64 currently stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 6,081,789 ("Purcell"). The Applicant respectfully disagrees and herein traverses the Examiner's §102(e) rejections of the above cited claims.

It is black-letter law that to be anticipatory, a reference must disclose each and every limitation of a claimed invention. Purcell falls far short of this requirement. Specifically, Purcell fails to disclose, suggest, or in any way render obvious, all of the elements of independent Claim 41. In particular, Purcell fails to disclose, suggest, or render obvious at least the elements of "establishing information and business rules common to members of each of one or more transaction communities stored in a database", "providing the at least one user with at least one option for resolving said bill, debt or other transaction according to said established information and business rules" and "wherein said transaction community comprises an account pool and associated electronic communication interfaces for said creditor and said user to conduct said interactive exchange of said information" as recited in Claim 41.

In the opinion of the Examiner, under Claim 41, “the host and manager of the system will want only those entities that are approved subscribers (meet requirements of a set of rules) to have access.” (Page 9, second paragraph). Furthermore, the Examiner states that “every member has an identifier. [Under the teachings of Claim 41] This constitutes information and one rule. Every member has a password. This constitutes a second rule and meets the broad limitation.” (Office Action dated September 24, 2007; Page 5 second paragraph).

The Applicant respectfully disagrees. To the contrary, the present invention’s “information and business rules” are very different from anything disclosed in Purcell. The Applicant respectfully draws the Examiner’s attention to paragraph [0135] in particular, which describes a screen that allows a creditor to “input default setting for the system...The user inputs minimum monthly payment information in “Minimum Monthly Payment 286,” the maximum number of months permitted to repay the debt in “Maximum Months to Pay the debt 287”, and the applicable interest rate in “Interest Rate 288.”” Here, the user is a representative of a collection agency or credit provider. (See, e.g. paragraph [0116]). Therefore, the step of “establishing information and business rules common to members of each of one or more transaction communities stored in a database,” as recited in Claim 41, is not the same as what the Examiner cited to in Purcell.

Indeed, the rules cited by the Examiner are not *business rules* for *transaction communities* as in the Applicant’s invention, they are merely rules for using a website. For example, Internet-based email services such as Gmail® and Yahoo! Mail® similarly require usernames (an identifier) and a password, but do not provide access to a

transaction community as claimed and described in the present application. Indeed, the Applicant's specification defines how business rules for a transaction community are established. (See, e.g., specification, paragraph [0135]). Here, "business rules common to members of each of one or more transaction communities" refers to the business rules that are used to determine the business logic, or applicable transaction parameters, of a transaction community. This is fully supported by the specification. (See, e.g., specification, paragraph [0135]).

Furthermore, the step of "establishing information and business rules" for "transaction communities" is neither disclosed, suggested, nor rendered obvious by Purcell. The Examiner states that Purcell shows an automated inventory system, and that "[t]he host information management system operates in a database format in which information pertaining to a particular product or service item is maintained as one of a plurality of records of the database...each record is assigned a unique identifier for tracking and processing purposes." According to the Examiner's own explanation, however, Purcell is directed towards a *relational database*. It is well known the data storage arts that records in databases have indexes, or unique identifiers, associated with each record. However, such an index is not a "business rule" for a transaction community as claimed by the Applicant. Rather, it is merely a database constraint or organizational feature. In stark contrast, as discussed above, the business rules referred to in the Applicant's Claim 41 are rules for working within a transaction community to resolve a debt.

Therefore, Purcell fails to disclose, anticipate or render obvious the Claim 41 method step of “establishing information and business rules common to members of each of one or more transaction communities stored in a database.”

As Purcell fails to anticipate, suggest, or in any way render obvious at least the Claim 41 elements of “establishing information and business rules common to members of each of one or more transaction communities stored in a database” and “providing the at least one user with at least one option for resolving said bill, debt or other transaction according to said established information and business rules” Claim 41 is patentably distinct over Purcell. The Applicant, therefore, respectfully requests that the Examiner withdraw this rejection of Claim 41.

Independent Claim 54 also stands rejected under §102 in view of Purcell, and recites method steps and elements analogous to those discussed above for Claim 41. Thus, the Applicant respectfully asserts that Claim 54 is patentable over Purcell for at least the same reasons discussed above for Claim 41.

Claims 44, 46, 47, 50 and 53 depend from Claim 41. By virtue of their dependency from Claim 41, Claims 44, 46, 47, 50 and 53 have all of the features and limitations of Claim 41. Claims 44, 46, 47, 50 and 53 are, therefore, patentable over Purcell for at least the reasons cited above for Claim 41. Similarly, Claims 55, 57 and 61 depend from Claim 54. By virtue of their dependency from Claim 54, Claims 55, 57 and 61 have all of the features and limitations of Claim 54. Claims 55, 57 and 61 are, therefore, patentable over Purcell for at least the reasons cited above for Claim 54. In view of the foregoing, the Applicant respectfully requests that the Examiner withdraw the §102 rejections of Claims 44, 46, 47, 50, 53, 55, 57 and 61.

Claim Rejections Under 35 U.S.C. §103(a)

Claims 42, 43, 45, 48, 49, 51, 52, 56, 58-60, 62 and 63 stand rejected under 35 U.S.C. 103(a) as obvious in view of Purcell and United States Patent No. 5,970,475 to Barnes, et al. ("Barnes"). The Applicant respectfully disagrees.

Claims 42, 43, 45, 48, 49, 51 and 52 depend from independent Claim 41, while Claims 56, 58-60, 62 and 63 depend from independent Claim 54. Claims 42, 43, 45, 48, 49, 51, 52, 56, 58-60, 62 and 63, therefore, have all of the features and limitations of the independent claims from which they depend, respectively.

As discussed above for Claims 41 and 54, Purcell fails to disclose, suggest, or in any way render obvious at least the elements of "establishing information and business rules common to members of each of one or more transaction communities stored in a database" and "providing the at least one user with at least one option for resolving said bill, debt or other transaction according to said established information and business rules."

Similarly, Barnes fails to teach the shortcomings of Purcell with respect to the Claims 42, 43, 45, 48, 49, 51, 52, 56, 58-60, 62 and 63. Barnes is directed to an electronic commerce system for corporate purchasers and suppliers. Specifically, Barnes is an electronic marketplace featuring automated payments by a bank to a supplier on behalf of a purchaser upon delivery of the supplier's goods.

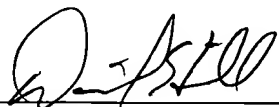
Like Purcell, Barnes does not disclose any elements that would anticipate or render obvious the elements of "establishing information and business rules common to members of each of one or more transaction communities stored in a database" or "providing the at least one user with at least one option for resolving said bill, debt or other transaction according to said established information and business rules." Thus, Purcell and Barnes, taken singly, or in combination, fail to anticipate, or render obvious every element of Claims 42, 43, 45, 48, 49, 51, 52, 56, 58-60, 62 and 63. The Applicant, therefore, respectfully requests that the Examiner withdraw the §103(a) rejection of Claims 42, 43, 45, 48, 49, 51, 52, 56, 58-60, 62 and 63.

CONCLUSION

In view of the foregoing, the Applicant respectfully submits that the present invention as claimed in claims 41-64 represents a patentable contribution to the art and that the application is in condition for allowance. Early and favorable action is accordingly solicited.

Respectfully submitted,

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